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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

APR 29 2008

JAMES N. HATTEN, Clerk  
By:  Deputy Clerk

**U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

**Plaintiff,**

**v.**

**SLEEVECO, INC.,**

**Defendant.**

Civil Action No.

**1 : 08 - CV - 1597**

JURY TRIAL  
DEMANDED

**COMPLAINT**

This is an action under Title VII of the Civil Rights Act of 1964 ("Title VII"), as amended, and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of sex and retaliation, and to provide appropriate relief to Tammy Stratton who was adversely affected by such practices. The Plaintiff alleges that Tammy Stratton was subjected to sexual harassment and a hostile work environment due to her sex, female, and terminated from her employment in retaliation for engaging in protected activity by reporting and/or opposing the sexual harassment, in violation of Title VII.

**JURISDICTION AND VENUE**

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451,

1331, 1337, 1343 and 1345. This action is authorized and instituted pursuant to Section 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-5(f)(1) and (3) (“Title VII”), and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a.

2. The employment practices alleged to be unlawful were committed within the jurisdiction of the United States District Court for the Northern District of Georgia, Atlanta Division.

### **PARTIES**

3. Plaintiff, the Equal Employment Opportunity Commission (the “Commission”), is the agency of the United States of America charged with the administration, interpretation and enforcement of Title VII and is expressly authorized to bring this action by Section 706(f)(1) and (3) of Title VII, 42 U.S.C. § 2000e-5(f)(1) and (3).

4. At all relevant times, Defendant, SleeveCo, Inc. (“Employer”) has continuously been doing business in the State of Georgia and the city of Dawsonville and has continuously had at least 15 employees.

5. At all relevant times, Defendant, SleeveCo, Inc., has continuously been an employer engaged in an industry affecting commerce under Section

701(b), (g) and (h) of Title VII, 42 U.S.C. § 2000e(b), (g) and (h).

### **STATEMENT OF CLAIMS**

6. More than thirty days prior to the institution of this lawsuit, Tammy Stratton filed a charge with the Commission alleging violations of Title VII by Defendant Employer. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. Since at least on or around November 15, 2006, Defendant Employer has engaged in unlawful employment practices at its Dawsonville, Georgia, facility in violation of Section 703(a) of Title VII, 42 U.S.C. § 2000e-2(a), by subjecting Stratton to sexual harassment and a hostile work environment due to her sex, female, and of Section 704(a) of Title VII, 42 U.S.C. § 2000e-3(a), by terminating Stratton in retaliation for engaging in protected activity by reporting and/or opposing the sexual harassment.

8. The effects of the practices complained of in paragraph 7, above, have been to deprive Stratton of equal employment opportunities and otherwise adversely affect her status as an employee because of her sex and/or protected activity.

9. The unlawful employment practices complained of in paragraph 7,

above, were intentional.

10. The unlawful employment practices complained of in paragraph 7, above, were carried out with malice and/or reckless indifference to the federally protected rights of Stratton.

**PRAYER FOR RELIEF**

WHEREFORE, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant Employer, its officers, agents, servants, employees, attorneys, and all persons in active concert or participation with them, from subjecting employees to sexual harassment and/or a hostile work environment, terminating employees in retaliation for engaging in protected activity, and any other employment practice which discriminates on the basis of sex and/or engaging in protected activity.

B. Order Defendant Employer to institute and carry out policies, practices, and programs which provide equal employment opportunities for female employees, and which eradicate the effects of its past and present unlawful employment practices.

C. Order Defendant Employer to make whole Stratton, by providing appropriate back pay with prejudgment interest, in amounts to be determined at

trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices.

D. Order Defendant Employer to make whole Stratton, by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described in paragraph 7, above, including job search expenses and medical expenses not covered by Defendant Employer's employee benefit plan, in amounts to be determined at trial.

E. Order Defendant Employer to make whole Stratton, by providing compensation for past and future non-pecuniary losses resulting from the unlawful employment practices described in paragraph 7, above, including emotional pain and suffering, loss of enjoyment of life, inconvenience, anxiety, stress, and humiliation, in amounts to be determined at trial.

F. Order Defendant Employer to pay to Stratton punitive damages for Defendant's malicious and/or reckless conduct described in paragraph 7, above, in amounts to be determined at trial.

G. Grant such further relief as the Court deems necessary and proper in the public interest.

H. Award the Commission its costs in this action.

**JURY TRIAL DEMAND**


The Commission requests a jury trial on all questions of fact raised by its Complaint.

Respectfully submitted,

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